

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>FREDERICK J. GREDE</b> , as Liquidation	)	
Trustee for the Sentinel Liquidation Trust,	)	Case No. 10-cv-01630
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Honorable Rebecca R. Pallmeyer
<b>DYNAMIC ALLOCATION CTA FUND</b>	)	
<b>LLC</b> ,	)	
	)	
Defendant.	)	

**AGREED MOTION FOR ENTRY OF CONSENT JUDGMENT**

Frederick J. Grede, not individually, but as Liquidation Trustee of the Sentinel Liquidation Trust (“**Trustee**”), hereby moves this Court for the entry of a consent judgment (the “**Consent Judgment**”) against defendant Dynamic Allocation CTA Fund LLC (“**Defendant**”), and states:

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. Venue is proper pursuant to 28 U.S.C. § 1409.

2. On August 17, 2007, Sentinel Management Group, Inc. commenced a voluntary chapter 11 case in the U.S. Bankruptcy Court for the Northern District of Illinois, bankruptcy case number 07-14987.

3. On December 15, 2008, the Bankruptcy Court confirmed the Debtor’s Fourth Amended Chapter 11 Plan of Liquidation, pursuant to which the Trust was established, and the Trustee was appointed as the liquidation trustee of the Trust and the representative of the Debtor’s estate.

4. On June 24, 2009, the Trustee commenced an adversary proceeding against the Defendant in the Bankruptcy Court, the reference of which was subsequently withdrawn by this Court, where it was assigned Case No. 10-cv-01630 (the “**Adversary Proceeding**”).

5. The Trustee's complaint in the Adversary Proceeding seeks *inter alia* to recover certain transfers made by Sentinel to the Defendant that the Trustee alleges are avoidable under the Bankruptcy Code. Defendant disputes these claims.

6. The Parties have entered into a Settlement Agreement, pursuant to which they have agreed to resolve the Adversary Proceeding by the entry of a final judgment against Defendant in the amount of \$2,735,691.47, plus post-judgment interest, in the same or substantially the same form as the proposed Consent Judgment attached hereto as Exhibit A.

WHEREFORE, the Trustee respectfully requests that the Court enter the proposed Consent Judgment attached hereto as Exhibit A.

Respectfully submitted,

Dated: June 7, 2018

FREDERICK J. GREDE, not individually but  
as Sentinel Liquidation Trustee,

By: /s/ Vincent E. Lazar  
One of his attorneys

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